

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Related Docket No. 448

**STATEMENT IN CONNECTION WITH THE MOTION OF GIVAUDAN SA
FOR AN ORDER DIRECTING THE PRODUCTION OF DOCUMENTS**

The above-captioned debtors and debtors-in-possession (the “Debtors”) hereby file this statement in connection with the *Motion of Givaudan SA for an Order Directing the Production of Documents* [Docket No. 448] (the “Motion”)² and respectfully state as follows:

1. The Debtors do not oppose the request by Givaudan SA (“Givaudan”) to produce the 2021 DSM Transaction Documents. However, as acknowledged in the Motion, the 2021 DSM Transaction Documents contain commercially sensitive information relating to the Debtors and direct competitors of Givaudan. As a result, the Debtors request that any order approving the Motion establish an appropriate document production protocol that gives all counterparties to the 2021 DSM Transaction Documents an adequate opportunity to review, comment on, and, if necessary, object to the scope of proposed redactions.

2. The Debtors anticipate working collaboratively with Givaudan and DSM-Firmenich on an appropriate document production protocol prior to the hearing on the Motion.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

Dated: October 11, 2023

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